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*Attorneys for Plaintiff/Counter-Defendant Allstate Life Insurance Company*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

ALLSTATE LIFE INSURANCE COMPANY,

Plaintiffs,

V.

JEFFREY STILLWELL, THERESA FRANCY,  
And STILLWELL FINANCIAL ADVISORS, LLC

Defendants.



Case No. 3:15 CV 8251 - AET-TJB

**MOTION FOR LEAVE TO  
SUBSTITUTE COUNSEL AND  
TO WITHDRAW AS COUNSEL  
FOR PLAINTIFF**

Now come James Yu and Robyn Marsh of the law firm Seyfarth Shaw LLP, (collectively, “Counsel”), as counsel of record for Plaintiff Allstate Life Insurance Company (“Plaintiff”), and move this Court for leave to substitute new counsel, and for Counsel to withdraw their appearance as counsel, for Plaintiff in the above-captioned action and any subsequent proceedings related thereto. In support thereof, Counsel state as follows:

1. Counsel has represented Plaintiff in the above-captioned action since commencement of this action.

2. Plaintiff recently retained attorneys J. Scott Humphrey and Daniel Meier of the law firm Benesch Friedlander Coplan and Aronoff, LLP, to represent Plaintiff in all matters relating to the above-captioned action.

3. Pursuant to Local Rule 102.1 of the United States District Court for the District of New Jersey, an attorney of record in a proceeding in which the appearance was filed may not withdraw without first obtaining leave of Court.

4. Accordingly and pursuant to Local Rule 102.1, Counsel hereby seeks leave to: (a) substitute attorneys J. Scott Humphrey and Daniel Meier and the law firm Benesch Friedlander Coplan and Aronoff as counsel of record for Plaintiff in the above-captioned action; and (2) permit the withdrawal of James Yu, Robyn Marsh and the law firm Seyfarth Shaw, LLP as counsel for Plaintiff in this action.

5. Counsel have advised Plaintiff of their intention to file the subject motion and have served this motion on Plaintiff.

6. The Court, Plaintiff, and Defendants will not suffer any prejudice as a result of Counsel's withdrawal as counsel of record in this action. Therefore, Counsel have demonstrated good cause for their withdrawal at this time, and the Court should grant Counsel's request for leave to withdraw as counsel of record for Plaintiff, and to substitute new counsel for Plaintiffs.

7. Counsel further request that the Court and Plaintiff serve all future pleadings, notices, correspondence and other documents directly upon Plaintiffs' new counsel:

J. Scott Humphrey  
Benesch Friedlander Coplan and Aronoff, LLP  
71 South Wacker Drive – Suite 1600  
Chicago, Illinois 60606

And

Daniel Meier  
Benesch Friedlander Coplan and Aronoff, LLP  
17 State Street - Suite 4000  
New York, New York 10004

**WHEREFORE,** James Yu, Robyn Marsh and the law firm Seyfarth Shaw LLP, respectfully request that the Court enter an order granting them leave to withdraw as counsel of record for Plaintiff Allstate Life Insurance Company, to substitute new counsel for Plaintiff as set forth herein, and for such other relief as is just and equitable.

**Date: November 5, 2021**

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ James S. Yu

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*Attorneys for Plaintiff Allstate Life Insurance  
Company*

**CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that on November 5, 2021, he electronically filed the foregoing with the Clerk of the Court using the ECF system, which will send notification to all counsel of record.

/s/ James S. Yu

James S. Yu